

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

KRISTIN PEREZ HAINES	:	CIVIL ACTION
	:	
v.	:	
	:	
RODNEY GENE LEE and	:	NO: 02-CV-4432
NORTHSTAR TRUCKING SERVICES, INC.	:	

**ORDER**

AND NOW, this       day of       , 2003, it is hereby ORDERED and  
DECREED that Plaintiff's Rebuttal Report deadline is extended to June 2, 2003.

**BY THE COURT:**

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J.

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FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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NORTHSTAR TRUCKING SERVICES, INC.	:	

**PLAINTIFF'S MOTION TO EXTEND**  
**REBUTTAL EXPERT REPORT DEADLINE**

Plaintiff, Kristin Perez Haines, by and through her attorney, Law Offices of Gregg R. Durlofsky, PC, request this Court to grant this Motion to Extend Rebuttal Expert Discovery Deadline and in support avers as follows:

1. On December 17, 2002, Defendants, Rodney Gene Lee and Northstar Trucking Services, Inc. through their attorneys filed a Motion to Extend Discovery Deadline. (See Exhibit "A").
2. In said Motion to Extend Discovery Deadline, Defendant requested relief in extending all discovery deadlines for sixty (60) days. (See Exhibit "A").
3. The Court on December 27, 2002 entered an Order extending the discovery deadlines. (See Exhibit "B").
4. All the Discovery Deadlines were extended with the exception of Plaintiff's deadline to submit Rebuttal Reports.
5. Currently Plaintiff's deadline to submit Rebuttal Reports (May 15, 2003) precedes Defendant's Expert Deadline (May 28, 2003). (See Exhibit "B").
6. Counsel for the defense has no objection to the extension of Plaintiff's Rebuttal

Report Deadline to June 2, 2003.

WHEREFORE, Plaintiff requests this Honorable Court grant her Motion to Extend Plaintiff's Rebuttal Report Discovery Deadline.

**LAW OFFICES OF GREGG R. DURLOFSKY**

By: \_\_\_\_\_  
Gregg R. Durlofsky, Esquire  
Attorney for Plaintiff

Dated:

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FOR THE EASTERN DISTRICT OF PENNSYLVANIA

KRISTIN PEREZ HAINES	:	CIVIL ACTION
	:	
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RODNEY GENE LEE and	:	NO: 02-CV-4432
NORTHSTAR TRUCKING SERVICES, INC.	:	

**CERTIFICATE OF SERVICE**

I, Gregg R. Durlofsky, hereby certify that I have forwarded a true and correct copy of Plaintiff's Motion to Extend Rebuttal Expert Report Deadline by first class mail, postage prepaid on the date shown below to the following interested counsel:

Dawn Jennings, Esquire  
The Widener Building  
One South Penn Square  
Philadelphia, PA 19107

**LAW OFFICES OF GREGG R. DURLOFSKY**

By: \_\_\_\_\_  
Gregg R. Durlofsky, Esquire  
Attorney for Plaintiff

Dated: